

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

OTTO BISHOP; and STATE FARM
MUTUAL AUTOMOBILE INSURANCE
COMPANY

Plaintiffs,

vs.

THE GOODYEAR TIRE AND RUBBER
COMPANY; and GOODYEAR DUNLOP
TIRES NORTH AMERICA, LTD.,

Defendants.

Civil No. 13-5062

DEFENDANTS' EXPERT
DISCLOSURES PURSUANT TO
FED.R.CIV.P. 26(a)(2)

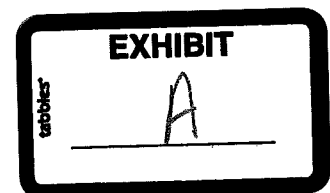
Pursuant to F.R.C.P. 26(a)(2) and the Scheduling Order in this case, Defendants, The Goodyear Tire & Rubber Company ("Goodyear") and Goodyear Dunlop Tires North America, Ltd. ("GDTNA"), by counsel, make the following expert witness disclosures:

A. Retained Expert Witnesses

1. Glenn D. Follen
10601 Turquoise Valley Drive
Las Vegas, NV 89144
210-219-5495

A copy of Mr. Follen's Expert Report is attached as Exhibit 1. The Expert Report includes Mr. Follen's opinions in rebuttal to the opinions of William Woehrle. The Expert Report also contains a statement of Mr. Follen's compensation and attaches a copy of his *curriculum vitae* and a list of other cases in which Mr. Follen has testified as an expert at trial or by deposition.

Mr. Follen will offer testimony and opinions consistent with his Expert Report and any amendment or supplement thereto, and consistent with any deposition testimony he may give in



B. Non-retained Expert Witnesses

1. Richard Scavuzzo:

Mr. Scavuzzo is Director of Tire Engineering for the Goodyear in Akron, Ohio. The subject matters on which Mr. Scavuzzo may testify, the opinions to which he may testify, along with the information considered by him in forming his opinions, are set forth in the Inflation Retention Test Results of Motorcycle Tire Test dated January 18, 2012, the Inflation Retention Test Results of Motorcycle Tire Test- Dynamic Testing dated April 25, 2012, and the Air Retention Study, produced in this case as Bates Nos. Goodyear-Bishop 000176-000187 and 000188-000200, and 001936-001937, respectively.

Materials that may be used at trial to assist in explaining Mr. Scavuzzo's testimony and opinions include the photographs, tires, wheels, diagrams, graphs and raw data relating to the testing referenced in the reports on which he may testify. Defendants reserve the right to use other exhibits admitted into evidence in this case to assist in the presentation of Mr. Scavuzzo's testimony.

2. Jay Lawrence:

Mr. Lawrence is an engineer employed by Goodyear in its Product Analysis group. The Product Analysis group of Goodyear provides forensic analysis of tires manufactured by Goodyear as well as tires manufactured by GDTNA. Mr. Lawrence was part of the team of engineers who inspected the D402 MU85816 rear tire that was on the Harley Davidson motorcycle being operated by Otto Bishop at the time of this occurrence ("Tire at Issue"), and will offer opinions and testimony regarding the scope of this inspection, the findings on inspection and the cause of the tire disablement.